

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

USDC - GREENBELT
'24 FEB 6 AM 10:52

THADDEUS MOORE

10069 GUILFORD RD.

JESSUP MARYLAND 20794

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

SUBBA REDDY

1000 PARRS RIDGE DRIVE

SPENCERVILLE MARYLAND 20868

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. DU3-24 CV 0361

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Thaddeus moore
Street Address	10069 Guilford.Rd.
City and County	Jessup Howard County
State and Zip Code	Maryland 20794
Telephone Number	(301) 642-6938
E-mail Address	thaddeusm090@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Subba Reddy
Job or Title (if known)	Real Estate Agent
Street Address	10770 Columbia Pike, Suite 250
City and County	Silver Spring Montgomery County
State and Zip Code	Maryland 20901
Telephone Number	(202) 510-8740
E-mail Address (if known)	

Defendant No. 2

Name	Dave Michalski
Job or Title (if known)	Owner RTS Realty Title Services
Street Address	3190 Fairview Park Drive, Suite 100
City and County	Falls Church Fairfax
State and Zip Code	Virginia 22042
Telephone Number	(703) 533-7500
E-mail Address (if known)	

Defendant No. 3

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 4

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C. 1983 Civil Action for Deprivation of Rights Under the Color of Law

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Thaddeus Moore, is a citizen of the State of *(name)* Maryland.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Dave Michalski, is a citizen of the State of (name) Virginia. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) RTS, is incorporated under the laws of the State of (name) Virginia, and has its principal place of business in the State of (name) Virginia. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) Virginia.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

16 million USD

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I Thaddeus Moore have suffered deprivation of my of my civil rights under the color of law, after having been arrested twice and unlawfully jailed for 3 weeks at the direction of the defendant for being on property that I legally own which is my home and residence.

The defendant was warned through his attorney that he did not own the property after being presented with a valid survey, additionally plaintiff's survey matches county plat survey

and was also warned through the plaintiff's attorney after the circuit court rulings that he was abusing the judicial process.

After three (3) Circuit court rulings against the defendant he continued to abuse the process.

Subsequently the plaintiff was wrongfully arrested twice and wrongfully jailed.

Dave Michalski owner of RTS (realty title services) was notified by the plaintiff of the actions of Subba Reddy a real estate agent at Fairfax Realty of which Dave Michalski also owns produced a fraudulent survey and was complicit. (See attached paperwork describing actions with dates.

Plaintiff was arrested by Howard County police on February 1, 2023

and again on May 30, 2023 by Howard County police in connection to this deprivation of civil rights

under the color of law. This defendant has charged me for the second time with trespassing on the property that is my residence. The first resulted in a not guilty verdict.

The second has resulted in my being arrested twice. Since my survey matches the county plat and the defendant does not have an easement, a gross miscarriage of justice has occurred.

Those subpoenas would include attorney Thomas McKnight who stated in his circuit court pleadings

the defendant was abusing the process through his attorney.

Attorney Doris Walker Green as well as Surveyor Gary Lane of Maryland surveying.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Plaintiff seeks an Permanent injunction as he has suffered irreparable

injury. Immediate ejection from the property. The remedy in equity is warranted upon consideration of the balance.

\$16 Million USD.

\$40 million in punitive damages

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: February 6, 2024
 Signature of Plaintiff Thaddeus Moore
 Printed Name of Plaintiff Thaddeus Moore

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____
 Printed Name of Attorney _____
 Bar Number _____
 Name of Law Firm _____
 Address _____
 Telephone Number _____
 Email Address _____